Mr. Werner Gondosch
Pernod Ricard USA, Seagram Lawrenceburg Distillery
P. O. Box 7
7 Ridge Avenue
Lawrenceburg, Indiana 47025

Re: 029-15990
First Administrative Amendment to
Part 70 029-6929-00005

Dear Mr. Gondosch:

Pernod Ricard USA, Seagram Lawrenceburg Distillery was issued a Part 70 permit on June 28, 2002 for a distillate spirits production source. A letter requesting a change was received on August 19, 2002. The change which has an insignificant emission qualifies as a "revision to descriptive information where the revision will not trigger a new applicable requirement or violate a permit term under 326 IAC 2-7-11, administrative amendment. Therefore the administrative amendment is as follows (changes are **bolded** and deletions are ~~struck-through~~ for emphasis):

(a) One (1) new 50-ml Bottling Line, with a capacity of 300 bottles per minute. The maximum throughput of all existing Bottling Lines (EU-52) including this proposed Bottling Line will stay the same at 16,000,000 Proof Gallon per year (P.G./yr).

(1) Section A.2 Emission Units and Pollution Control Equipment Summary, item (w) will be amended as follows:

(w) Seven (7) bottling lines, known as EU-52 installed prior to 1950, **and one (1) new 50-ml bottling Line** exhausted to S-520, capacity: 7,264 cases per hour.

(2) Section D.2 will be amended to include the new bottling line:

Facility Description [326 IAC 2-7-5(15)]:

(q) One (1) wine room, known as EU-41, consisting of thirty-five (35) tanks, installed prior to 1950, exhausted to S-410, capacity: 467,517 gallons of ethanol, total.

(r) One (1) tank farm, known as EU-42, consisting of nine (9) tanks, installed prior to 1950, exhausted to S-420, capacity: 750,000 gallons of ethanol, each.

(s) One (1) Bldg 88, known as EU-43, consisting of twenty-seven (27) tanks and, installed in 1989, exhausted to S-430, capacity: 489,250 gallons of ethanol, total and one (1) rum handling, installed in 1997, exhausted to the atmosphere, capacity: 3,501,429 gallons of rum.

(t) One (1) regauge tank area, known as EU-44, consisting of forty-seven (47) tanks, installed in 1960, exhausted to S-440, capacity: 445,858 gallons of ethanol, total.

(u) One (1) mini tank farm, known as EU-45, to consist of nine (9) tanks, seven tanks installed in 1989, exhausted to S-435, capacity: 779,800 gallons of ethanol, total, two (2) gin storage tanks, installed in 1997, capacity: 113,800 gallons of gin, each.

(v) One (1) bottling tank room, known as EU-51, consisting of forty-one (41) tanks, installed in 1969, exhausted to S-510, capacity: 412,000 gallons of ethanol, total.

(w) Seven (7) bottling lines, known as EU-52 installed prior to 1950, **and one (1) new 50-ml bottling Line** exhausted to S-520, capacity: 7,264 cases per hour.

(x) One (1) cooler operation, known as EU-53, installed prior to 1988, exhausted to S-530, capacity: 2,187 cases per hour.

(y) One (1) Warehouse C, known as EU-71, installed prior to 1950, exhausted to S-701, capacity: 69,306 barrels.

(z) One (1) Warehouse E, known as EU-72, installed prior to 1950, exhausted to S-702, capacity: 101,032 barrels.

(aa) One (1) Warehouse G, known as EU-73, installed prior to 1950, exhausted to S-703, capacity: 84,097 barrels.

(bb) One (1) Warehouse J & M, known as EU-74, installed prior to 1950, exhausted to S-704, capacity: 100,000 barrels.

(cc) One (1) Warehouse L, known as EU-75, installed prior to 1950, exhausted to S-705, capacity: 93,438 barrels.

(dd) One (1) Warehouse N, known as EU-76, installed prior to 1950, exhausted to S-706, capacity: 93,405 barrels.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

(3) The following conditions will be added in Section D.2 of the Part 70 permit and be numbered as D.2.2:

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 No change

D.2.2 Volatile Organic Compounds [326 IAC 8-1-6]

The VOC potential emissions from the new 50-ml bottling Line is less than 25 tons per year. Therefore, the Best Available Control Technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply. Any change or modification which may increase the potential VOC emissions to 25 tons per year or more from this line shall be subject to 326 IAC 8-1-6, and shall be approved by the Office of Air Quality (OAQ) before such change may occur.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.~~2~~ **3** Record Keeping Requirements ~~[326 IAC 2-6]~~

(a) The Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to comply with all emission reporting requirements:

(1) The number of barrels in storage, and

(2) The material(s) being stored in each barrel.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

All conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
APD
cc: File - Dearborn County
U.S. EPA, Region V
Dearborn County Health Department
Air Compliance Section Inspector - Joe Foyst
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Pernod Ricard USA, Seagram Lawrenceburg Distillery
7 Ridge Avenue
Lawrenceburg, Indiana 47025

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 029-6929-00005	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 28, 2002 Expiration Date: June 28, 2007
1st Administrative Amendment No.: 029-15990	Pages Affected: 9, 36, 37
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Chief Permit Branch Office of Air Quality	Issuance Date: August 30, 2002

(w) Seven (7) bottling lines, known as EU-52 installed prior to 1950, and one (1) new 50-ml bottling Line exhausted to S-520, capacity: 7,264 cases per hour

(x) One (1) cooler operation, known as EU-53, installed prior to 1988, exhausted to S-530, capacity: 2,187 cases per hour.

(y) One (1) Warehouse C, known as EU-71, installed prior to 1950, exhausted to S-701, capacity: 69,306 barrels.

(z) One (1) Warehouse E, known as EU-72, installed prior to 1950, exhausted to S-702, capacity: 101,032 barrels.

(aa) One (1) Warehouse G, known as EU-73, installed prior to 1950, exhausted to S-703, capacity: 84,097 barrels.

(bb) One (1) Warehouse J & M, known as EU-74, installed prior to 1950, exhausted to S-704, capacity: 100,000 barrels.

(cc) One (1) Warehouse L, known as EU-75, installed prior to 1950, exhausted to S-705, capacity: 93,438 barrels.

(dd) One (1) Warehouse N, known as EU-76, installed prior to 1950, exhausted to S-706, capacity: 93,405 barrels.

(ee) One (1) steam boiler, known as EU-96, using coal, CBAF, natural gas, fuel oil #6, and/or wood, installed in 1977, exhausted to S-906, equipped with an electrostatic precipitator for particulate matter control, rated at 244 million British thermal units per hour.

(ff) One (1) natural gas fired steam boiler, known as EU-97 using fuel oil #2 as back-up, installed in 1992, exhausted to S- 907, rated at 47.6 million British thermal units per hour using natural gas and 45.6 million British thermal units using fuel oil #2.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-1]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(q) One (1) wine room, known as EU-41, consisting of thirty-five (35) tanks, installed prior to 1950, exhausted to S-410, capacity: 467,517 gallons of ethanol, total.

(r) One (1) tank farm, known as EU-42, consisting of nine (9) tanks, installed prior to 1950, exhausted to S-420, capacity: 750,000 gallons of ethanol, each.

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(u) One (1) mini tank farm, known as EU-45, to consist of nine (9) tanks, seven tanks installed in 1989, exhausted to S-435, capacity: 779,800 gallons of ethanol, total, two (2) gin storage tanks, installed in 1997, capacity: 113,800 gallons of gin, each.

(v) One (1) bottling tank room, known as EU-51, consisting of forty-one (41) tanks, installed in 1969, exhausted to S-510, capacity: 412,000 gallons of ethanol, total.

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(dd) One (1) Warehouse N, known as EU-76, installed prior to 1950, exhausted to S-706, capacity: 93,405 barrels.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 PSD [326 IAC 2-2] [40 CFR 52.21]

The applicable requirements for these facilities are listed in Sections B and C of this permit.

D.2.2 Volatile Organic Compounds [326 IAC 8-1-6]

The VOC potential emissions from the new 50-ml bottling Line is less than 25 tons per year. Therefore, the Best Available Control Technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply. Any change or modification which may increase the potential VOC emissions to 25 tons per year or more from this line shall be subject to 326 IAC 8-1-6, and shall be approved by the Office of Air Quality (OAQ) before such change may occur.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.3 Record Keeping Requirements

(a) The Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to comply with all emission reporting requirements:

(1) The number of barrels in storage, and

(2) The material(s) being stored in each barrel.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Company Name: Pernod Picard USA, Seagram Lawrenceburg Distillery
Address of Company: 7 Ridge Avenue, Lawrenceburg, Indiana 47025
Operating Permit No.: T029-6929
Plant ID No.: 029-00005
Reviewer: Aida De Guzman

The source proposes to install a new 50 ml. Bottling Line, which has a maximum capacity of 300 bottles per minute.

The calculations will be based on the worst case of 101 Proof.

VOC Emissions = 300 bottles/min * 60 min/hr * 8760 hrs/yr * 50 ml/bottle * 0.001 liter/ml * gal/3.785 liters * 101/100 Proof * 0.496 lb/1000 P.G. * ton/2000 lb
= 0.52 ton/year

State Rule Applicability:

(a) 326 IAC 8-1-6 (General Reduction Requirements)
This rule applies to new facilities as of January 1, 1980, which have potential VOC emissions of 25 tons per year or more per year located anywhere in the state, which are not regulated by other provisions of 326 IAC 8, shall reduce VOC using Best Available Control Technology.

The new 50 ml. Bottling Line is **not** subject to 326 IAC 8-1-6, since its VOC potential emission is less than 25 tons per year. However, any change or modification which may increase the potential VOC emissions to 25 tons per year or more from this line will be subject to 326 IAC 8-1-6, and must be approved by the Office of Air Quality (OAQ) before such change may occur.